

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONIC CO., LTD and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:23-CV-00103-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF ANDRIA RAE CRISLER
IN SUPPORT OF SAMSUNG'S REPLY IN SUPPORT OF
ITS MOTION TO STAY PENDING *INTER PARTES* REVIEW**

I, Andria Rae Crisler, hereby declare:

1. I am a principal with the law firm Fish & Richardson P.C., and counsel for Defendants Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. I have personal knowledge of the facts contained in the declaration and, if called upon to do so, I could and would testify competently to the matters herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of IPR2023-01157 Institution Decision, dated January 22, 2024.

3. Attached hereto as Exhibit 2 is a true and correct copy of IPR2023-01226 Institution Decision, dated February 8, 2024.

4. Attached hereto as Exhibit 3 is a true and correct copy of a series of emails between Headwater counsel and Samsung counsel regarding Headwater's infringement contentions.

5. Attached hereto as Exhibit 4 is a true and correct copy of a series of emails between Headwater counsel and Samsung counsel regarding Headwater's responses to Samsung Interrogatory Nos. 1-14.

6. Attached hereto as Exhibit 5 is a true and correct copy of Plaintiff Headwater Research LLC's Disclosure of Asserted Claims and Infringement Contentions, dated September 28, 2023.

7. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiff Headwater Research LLC's Objections and Responses to Defendants' First Set of Requests for Admission (Nos. 1-2), dated December 6, 2023.

8. Attached hereto as Exhibit 7 is a true and correct copy of a November 22, 2023 Letter to Plaintiff's counsel from Defendants' counsel regarding infringement contentions.

9. Attached hereto as Exhibit 8 is an exhibit created for purposes of this motion showing the various dates associated with the four IPRs Samsung has filed as to the three asserted patents.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of February, 2024, in Richmond, VA.

/s/ Andria Rae Crisler
Andria Rae Crisler